

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,
Appellee,

V.

JAQUORI LYONS,
Defendant-Appellant.

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) Docket No. 1:23-CR-10186

MOTION FOR LEAVE TO SUBMIT SEALED FILING

Pursuant to Local Rule 7.2, 83.6.11, and this court's Standing Order Regarding Motions for Leave to File Under Seal and Stipulated Protective Orders (August 6, 2025), the Defendant here moves for leave to submit a sealed filing. As reason therefor he asserts that counsel intends to file a motion to withdraw. Preventing disclosure of privileged and confidential attorney-client communication is a compelling reason that outweighs the public's presumptive right of access.

Disclosure of otherwise confidential attorney communications will have the following negative effects on the Defendant: (1) tending to reveal trial strategy, (2) tending to reveal the nature of his strategic

thinking regarding motion practice, plea negotiations, and advocacy at sentencing, and (3) possibly rendering the future appointment of counsel or hiring of counsel more challenging if the reasons for withdrawal involve a breakdown of relationship or other evidence of unpleasant interactions between counsel and defense.

For these reasons, the request to file the withdrawal motion under seal should be allowed. A redacted version for public filing is simultaneously filed here as Exhibit 1.

Respectfully Submitted,
JAQUORI LYONS
By Counsel,
/s/ Dana Goldblatt
Massachusetts BBO# 601022
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FOR THE DISTRICT OF MASSACHUSETTS**

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v.)	Docket No. 1:23-CR-10186
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<i>Defendant.</i>)	
)	

CERTIFICATIONS

Certificate of Consultation

I hereby certify pursuant to Local Rule 7.1 that I conferenced the Defendant's Motion for Leave to Submit Sealed Filing with counsel for the Government on September 30, 2025, and the Government assents to the motion.

/s/ Dana Goldblatt

Certificate of Service

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) on September 30, 2025.

/s/ Dana Goldblatt